

# Exhibit A

**From:** [Nora Ahmed](#)  
**To:** [Khalil v. Trump \(All-Counsel\)](#)  
**Subject:** FW: M. Khalil, [REDACTED] Request to confirm time for release on Friday and the withdrawal of the charge under INA 237(a)(4)(C) (readnow for Marc's filtering))  
**Date:** Friday, June 13, 2025 9:38:15 AM  
**Attachments:** [image001.png](#)

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-[external]-

**Nora Ahmed** | Legal Director

Pronouns: she, her, hers

**American Civil Liberties Union of Louisiana**

P.O. Box 56157, New Orleans, LA 70156

Tel: [REDACTED]

*\*Admitted to the New York Bar, not admitted to the Louisiana Bar*

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**From:** Marc Van Der Hout [REDACTED] >  
**Date:** Thursday, June 12, 2025 at 5:16 PM  
**To:** Miller, Alice M <[REDACTED]> > [REDACTED]  
[REDACTED] >  
**Cc:** Johnny Sinodis <[REDACTED]>, Oona Cahil <[REDACTED]>, Nora Ahmed <[REDACTED]>, Marc Van Der Hout [REDACTED] >, Ladwig, Scott G <[REDACTED]> v>, Hartnett, John <[REDACTED]>  
**Subject:** RE: M. Khalil, [REDACTED] Request to confirm time for release on Friday and the withdrawal of the charge under INA 237(a)(4)(C) (readnow for Marc's filtering))

Will do Brian. Thanks.

Alice, same question then for you. We do understand there is a stay in effect under tomorrow morning at 9:30 a.m. CT. We have seen nothing further so asking if the status quo maintains, what time Mr. Khalil would be available for pick up? Thanks.

Marc

Marc Van Der Hout

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**From:** Acuna, Brian S <[REDACTED]>  
**Sent:** Thursday, June 12, 2025 11:23 AM  
**To:** [REDACTED]  
**Cc:** Johnny Sinodis <[REDACTED]>; Oona Cahill <[REDACTED]>; Nora Ahmed <[REDACTED]>; Marc @ Home <[REDACTED]>; Ladwig, Scott G <[REDACTED]>; Hartnett, John <[REDACTED]>; Miller, Alice M <[REDACTED]>  
**Subject:** RE: M. Khalil, [REDACTED] Request to confirm time for release on Friday and the withdrawal of the charge under INA 237(a)(4)(C) (readnow for Marc's filtering))

Thank you for clarifying. I have no information your client will be released or a time for that. We are asking on legal matters to first directly contact our Office of the Chief Counsel, for which I will make sure you have an appropriate POC. I added our Chief Counsel for visibility.

**Brian S. Acuna**

Acting Field Office Director  
New Orleans Field Office

**Enforcement and Removal Operations  
U.S. Immigration and Customs Enforcement**

c: [REDACTED]

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**From:** Marc Van Der Hout <[REDACTED]>  
**Sent:** Thursday, June 12, 2025 1:16 PM  
**To:** Acuna, Brian S <[REDACTED]>; Ladwig, Scott G <[REDACTED]>

**Cc:** Johnny Sinodis [REDACTED]; Oona Cahill <[REDACTED]>; Nora Ahmed <[REDACTED]>; Marc @ Home [REDACTED]

**Subject:** RE: M. Khalil, [REDACTED] Request to confirm time for release on Friday and the withdrawal of the charge under INA 237(a)(4)(C) (readnow for Marc's filtering))

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Thanks for the quick response, Brian. Yes, we are aware the District Court order does not go into effect until 9:30 a.m. CT tomorrow. I was, and am, writing to ask about tomorrow what time he might be available to be released.

Marc

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**From:** Acuna, Brian S <[REDACTED]>

**Sent:** Thursday, June 12, 2025 3:04 AM

**To:** Marc Van Der Hout <[REDACTED]>; Ladwig, Scott G <[REDACTED]>

**Cc:** Johnny Sinodis <[REDACTED]>; Oona Cahill <[REDACTED]>; Nora Ahmed <[REDACTED]>; Marc @ Home [REDACTED]

**Subject:** RE: M. Khalil, [REDACTED] Request to confirm time for release on Friday and the withdrawal of the charge under INA 237(a)(4)(C) (readnow for Marc's filtering))

Morning Marc. Your email was received but premature. Per the USDC judge order it is not in effect at this time. Our posture on the case therefore remains the same. I'd advise that no travel arrangements are made by anyone. Thank you.

**Brian S. Acuna**

Acting Field Office Director  
New Orleans Field Office

**Enforcement and Removal Operations**

**U.S. Immigration and Customs Enforcement**

C: [REDACTED]

---

**From:** Marc Van Der Hout <[REDACTED]>

**Date:** Thursday, Jun 12, 2025 at 00:03

**To:** Acuna, Brian S <[REDACTED]>, Ladwig, Scott G

<[REDACTED]>

**Cc:** Johnny Sinodis <[REDACTED]>, Oona Cahill <[REDACTED]>, Nora Ahmed

[REDACTED], Marc @ Home <[REDACTED]>

**Subject:** RE: M. Khalil, [REDACTED] Request to confirm time for release on Friday and the withdrawal of the charge under INA 237(a)(4)(C) (readnow for Marc's filtering))

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Dear Acting Field Office Director Acuna,

As you are likely aware, Judge Farbiarz of the federal district court for the District of New Jersey issued a preliminary injunction today enjoining ICE from "seeking to remove [Mr. Khalil] from the United States based on the Secretary of State's determination, as reflected in the Secretary's memorandum to the Secretary of Homeland Security." *Khalil v. Joyce*, 2:25-cv-01963-MEF-MAH, Dkt. 299 (D.N.J. June 11, 2025) ("Order") at 12, attached here. Based on finding the Rubio determination likely unconstitutional, Judge Farbiarz further preliminarily enjoined ICE "from detaining [Mr. Khalil] based on the Secretary of State's determination." *Id.* at 13. The District Court also found "as a matter of fact that it is overwhelmingly likely that [Mr. Khalil] would not be detained based solely on the lawful-permanent-resident application charge." *Id.* at 10.

In light of the federal district court's ruling today, we are writing to confirm that ICE will inform the Immigration Judge that it withdraws the foreign policy charge under INA 237 (a) (4)(C) based on the now declared unconstitutional Rubio Memorandum on Friday when Judge Farbiarz's ruling will take effect. In addition, because the foreign policy charge was the only basis for his detention, please also confirm that ICE will release Mr. Khalil on Friday morning based on Judge Farbiarz's ruling and let us know what time he will be available to be picked up. As I am sure you can understand, his wife would like to make advance arrangements for Mr. Khalil's release on Friday so that he can return to her and their infant son as soon as possible.

Thank you for your prompt attention to this email. We are requesting a response by close of business on Thursday so that travel arrangements can be made.

Sincerely,

Marc Van Der Hout  
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